

THE REICH LAW FIRM

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*Counsel for Defendants
GH Express Cali Inc. and Manjinder Kaur*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PROCAPS LABORATORIES, INC., a Nevada corporation

Case No. 2:21-CV-02016-CDS-BNW

Plaintiff,

V.

GH EXPRESS CALI, INC, a Foreign
Corporation; MANJINDER KAUR d/b/a GH
EXPRESS; DOES 1-10, inclusive; and ROES
1-10 inclusive

Defendants.

GH EXPRESS CALI INC,
Counterclaimant.

v.

PROCAPS LABORATORIES INC,
Counter Defendant.

**MOTION OF DEFENDANTS GH
EXPRESS CALI, INC., AND
MANJINDER KAUR d/b/a GH
EXPRESS TO EXTEND THE TIME
WITHIN WHICH DEFENDANTS
MUST ENGAGE LOCAL COUNSEL**

COME NOW Defendants, GH EXPRESS CALI, INC. (“GH EXPRESS”) and MANJINDER KAUR d/b/a GH EXPRESS (“Kaur”) (collectively the “Defendants”), by and through their counsel of record, Jeff Reich of the Reich Law Firm, and hereby file this their Motion To Extend the Time within which Defendants Must Engage Local Counsel.

Pursuant to Local Rule LR IA 11-2(d) and this Court's order of December 1, 2022 (ECF No. 59), Defendants are required to engage new local counsel following the withdrawal of Ms. Smith as local counsel for Defendants by December 16, 2022.

In an effort to meet these requirements, the undersigned has corresponded and spoken with local counsel who are currently evaluating the case, but are not able to complete that evaluation by today. Accordingly, because we are in the midst of the Christmas season, Defendants seek an

1 extension of two weeks, until December 30, 2022, to designate new local counsel.

2 Dated this 16th day of December, 2022.
3

4 **THE REICH LAW FIRM**

5 /s/ Jeff Reich
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10 *Counsel for Defendants/Counterclaimants*
11 *GH Express Cali Inc. and Manjinder Kaur*

12 **ORDER**
13 **IT IS SO ORDERED**

14 **DATED:** 3:08 pm, December 19, 2022

15 

16 **BRENDA WEKSLER**
17 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that the undersigned served by mail, with first-class postage prepaid, and served electronically

MOTION OF DEFENDANTS GH EXPRESS CALI, INC., AND MANJINDER KAUR d/b/a GH EXPRESS TO EXTEND THE TIME WITHIN WHICH DEFENDANTS MUST ENGAGE LOCAL COUNSEL

To the following, addressed as follows:

Michael V. Infuso
Green Infuso, LLP
3030 South Jones Blvd, Suite 101
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Email: minfuso@greeninfusolaw.com

I further certify that I am not a party to this lawsuit, I am over 18 years of age, and am employed as follows:

The Reich Law Firm
8441 N. Millbrook, Suite 104
Fresno, California 93720
Email: jreich@reichlaw.com
rlaw@reichlaw.com

Dated this 30th day of November, 2022.

2022.

Sona Vartanian

CERTIFICATE OF SERVICE